Subcommittee of the Water Resources Coordinating Council To Focus on Recommendations required by HF756 (WRCC Established under Iowa Code Chapter 466B)

SURVEY FEEDBACK

This chart demonstrates the level of support, opposition, or neutrality indicated by respondents to a public survey regarding draft flood plain management recommendations being considered by the Water Resources Coordinating Council for submission to the Governor and General Assembly by November 15, 2009.

*NOTE: Respondents were asked to identify their top three priorities within each of four groupings of recommendations. Most respondents marked issues that they supported as priorities, but several prioritized an item they opposed.

	Group 1: Flood Plain Management	Support	Oppose	Neutral	*Top Three
1	Regulate to .2% flood	36	21	13	14
2	Prohibit floodway development	47	20	7	36
3	Restrict elevation to 3 vertical ft.	34	19	16	8
4	Landward side of levee not in .2% flood plain	34	14	17	2
5	Levees primarily to protect existing development	45	7	16	3
6	Support Corps of Engineers Alternative H	29	5	33	4
7	State grant program for levee certification	51	3	16	4
8	State grant program to improve existing levees	48	9	11	6
9	State grant program to develop flood plain management plans	56	5	10	10
10	Form Iowa chapter of Association of State Flood Plain Managers	44	8	16	8
11	Fund public education by ISU Extension on flood plains and risks	41	8	16	7
12	Locate critical facilities outside .2% flood plain when practical	51	3	13	12
	Group 2: Lowland Focus				
13	Fund watershed project planning & damage reduction projects	58	2	8	11
14	Interagency assessment & planning re floodplain investments	43	7	16	8
15	Interagency program coordination by WRCC	44	9	21	4
16	Reconnect streams and rivers to floodplains and floodways	35	16	15	4
17	Authorize easement purchase for planned flood risk reduction projects	50	9	10	10
18	Levee modification or removal w/ indemnification for farmland used as retention	38	13	10	10
19	Integrate multi-purpose wetlands into watersheds	48	4	11	11
20	Seasonal retention of water in tile drained fields	41	12	12	9
21	Develop watershed project with infiltration focus	47	3	13	7
22	Enhance existing federal water & conservation programs w/ state matching funds	45	6	14	4
23	Conduct cooperative pilot project to reduce scour erosion and sand deposition	38	7	17	4
24	Include floodplain or soils information in real estate disclosure	47	5	13	8
25	Use ISU's I-Farm tool to support conservation & business planning	43	2	25	2

	Group 3: Upland Focus				
26	Support prior water recommendations (EXHBT 3)	34	7	23	7
27	Fund pilot project for flood reduction	46	5	12	18
28	Manage existing water programs for flood risk	48	3	17	9
29	Public floodplain education through ISU Extension	44	5	17	8
30	Conduct hydrological tiling study	49	6	11	16
31	Develop soil moisture monitoring network	32	5	23	0
32	Use NRCS Soil Conditioning Index	25	4	29	1
33	Media campaign on watershed issues	42	7	20	6
34	Analyze storm frequency for prediction accuracy	48	5	15	10
35	Reassess conservation practices criteria	41	3	19	9
36	Increase funding for research and field staff	39	3	25	3
37	Recommend multi-year funding for Iowa Flood Center	28	6	17	2
38	Possible funding source if referendum passes & sales tax increased	31	16	19	4
39	Possible funding source from water fees	26	16	19	2
	Group 4: Stormwater				
40	Phase in statewide stormwater standards consistent w/ state manual	33	10	15	6
41	Require New & Amend Renewal NPDES Permits to include best stormwater practices	35	15	16	5
42	Increase state government's usage of Iowa Stormwater Management Manual	49	8	12	4
43	Increase stormwater funding	45	9	11	13
44	Authorize cities to collect stormwater connection fee	45	12	12	8
45	Authorize cities & counties a fee system and credit program for impervious surfaces	46	14	12	11
46	Allow Soil & Water Conservation Districts to create watershed districts w/ tax authority	36	18	14	9
47	Support and enhance existing educational efforts	58	4	5	5
48	Conduct a hydrological tiling study	45	7	16	7

The following comments were provided by respondents to a public survey regarding draft flood plain management recommendations being considered by the Water Resources Coordinating Council for submission to the Governor and General Assembly by November 15, 2009.

Recommendations that should be added:

Develop policies that prevent flooding. Hold farmers and developers financially accountable for practices that damage the environment.

Take whatever FEMA standards are and make our triply more stringent.

Exempt critical infrastructure: Energy generation and delivery infrastructure along with water, transportation and other utilities should be exempted from the expansion of flood plain regulation. Defining specific infrastructure would significantly clarify the intent of the critical infrastructure recommendation.

Repair and re-use: MidAmerican is concerned about regulatory interpretation that prevent the regular maintenance or emergency reconstruction of infrastructure in the floodplain and floodways. Communities need energy service, both natural gas and electric, to recover from disaster and to support other critical infrastructure like drinking water and transportation.

Study first, then act: MidAmerican believes that comprehensive review of the proposed .2% flood levels and floodways should occur before any expansion of floodplain regulation. The present 30-year-old FEMA flood map and hydrologic models are not adequate to make informed decisions. Investment in accurate modeling and mapping is necessary before any legislative.

Current homes that meet the 100 year flood plain elevation need to be grandfathered in when increasing to the 500 year standard. Fill that redirects or inhibits the flow of flood water should be prohibited.

Encourage the use of Rain Gardens and Rain Barrels in urban areas.

Current NPDES requirements pertain solely to construction sites. Much improvement is needed in the Ag industry in regards to protection from erosion... a stream buffering requirement would go a long way in reducing erosion from surface run-off as well as allowing stream banks to re-stabilize.

Existing local government agencies and state and federal regulatory agencies should work together to address floodplain and floodway issues – like they did years ago. Where the no till practice are implemented this has been corrected (infiltration has increased from .25 in per 30 minutes to .5 in 7 minutes). This was part of a watershed study on 9600 acres in southern Black Hawk County (96% row crop)

More emphasis on no till practices should be part of the farm program.

In Black Hawk County an estimated 80% of the land is in cropland and the farming practices (removal of fence row, filter areas along streams) has changed the rural runoff by a factor of 400%

Empower and develop local-led watershed districts. (Small, neighborhood working with neighborhoods) Encourage stewardship.

Improve efficiency in permitting process for storm water and flood protection projects. Clarify watershed definition. There is wide variation in perception from a very small watershed to the ultimate Mississippi drainage system.

Bring all drainage districts into any planning with a standardized blue print of directions. For standardized drainage district action.

Review of processed that constrain positive development - Example IDNR \$.25 per ton fee for removal of sand from river channels. I'm sure there are more examples where our police s are counterproductive.

Strict guidelines for cities to follow mitigate flood risk.

If development is allowed in a floodplain and way (which I am 100% against) then we need to restrict the fill.

Fill should not be allowed in floodplain unless it comes from within and plans for development should be required to have 0 negative effects on neighbors. We need to watch out for today and future generations.

No more unfunded mandates. Small cities cannot afford them.

Under Floodplain Management, I would like to see "Assess/Evaluate Existing Flood Plain Management". Currently, there is a varying ability of small cities to "do a good job" effectively enforcing floodplain regulations. Larger communities do well, but I have concerns that we are not doing as well with the existing regulations in smaller communities.

We need better field drainage to not flood towns we need better protection and not have to bare the expense that the county should pay for.

Sand needs to be taken out of the rivers.

I do not understand all the questions on the survey, or in some cases, just what they mean. Some are pretty vague.

Any expenditures of runoff control north of I-80 would be the best answer to a complex problem.

Allow greater funding for rain gardens, returning streams to original state (reversing the channelization), and funding for upland ponds to slow water flow.

It has been a few years, but last I looked there is an Iowa LAW, legalizing the straightening of natural water ways; the tributaries and Creeks / Streams of natural drainage to the greater flow. This should be abolished. Educate the attributes of meander. As a child I observed concrete tunnels (multi-block-long culverts) created where Natural tributaries, those little streams that may dry by late summer or early fall, ran; effectively main lining the water to a greater flowing stream, and elimiinating any chance of infiltration along what was its natural course. A side effect being a greater total harsh flow, and for those who bought houses builit along what had been the natural stream; water in their basement, _frequently. This practice continues today, as some think it esthetically and commercially better. Advised planting of Native grasses even along the now tunneled urban tributaries would surely help, as the natural drainage still migrates to what once was its course; runs off and/or collects and stands. Advertise examples of pleasantly peoplized (read neatly manicured) banks and wooded / vegetated

areas along these tributaries, which some would demean with the term ditch or gully. There was a flurry of media attention on 'Wetlands' a few years ago; seemed almost a buzz phrase for a few weeks. Within just a few months I observed the last public mini-wetland in my town, be piped direct to the nearby Creek; for mowing convenience of a city park. Rare would it be that I believe a wetland can be 'created'. As I understand it, the water essentially comes subteranean to a true wetland. Education may best start with the youth, but adults on city councils, parks and rec boards (though mostly sport oriented), Utility people and such, need to become better educated to the better bigger picture

Examples of Best Practices in Iowa that should be replicated in other areas of the state:

Implement what Wayne Peterson recommends. Stop CAFO's, make agriculture sustainable. Slow down water going into title drainage with blind intakes, etc.

Charlotte, North Carolina

The State of Iowa should develop inundation mapping tools to the greatest extent possible. While not in use in Iowa, these technological tools were very valuable in recent North Dakota flooding along the Red River. Accurate flooding forecasts may not prevent flood damage but can significantly improve the decision-making for both emergency response and mitigation.

It is difficult to locate such practice within the City of Cedar Rapids, the mindset must change. There has been a lot of talk but no action.

No till farming be recognized for its major change in runoff.

Cut all tiling in fields. This is something that State of Ohio is doing, charge fees per linear ft. of tile.

Study Palo northern area.

Bring all drainage districts into a coordinated – standardized water and tile management plan. Just like building planning and zoning.

Retention ponds – lakes for storage of runoff and manage for flood control not fish and wildlife or recreation boating or shoreline residential or business development.

Cedar Falls is just now starting to look at revising ordinance for floodplain development/fill. Long overdue since the worse disaster to hit us was over a year ago.

Let quarry or cement company prod (?) river at no cost.

Ponds and holding areas again north of I-80

Not in Iowa, but Grand Forks saved themselves this year from another flood by implementing their plan quickly (less than 10 years)

Some good WIRB projects out there

Funding Recommendations:

Move funding to programs that teach people responsible ways to farm and help them implement practices that prevent flooding, soil erosion and water pollution. Teach homeowners how to landscape in sustainable ways.

Take all casino profits and apply them to water quality issues.

New housing developments need to have impervious driveways and streets. Limit street width to 26ft. Rain water retention.

Use funding from the I Jobs, Federal stimulus, Federal grants and Iowa Gaming Commission.

Storm water fees based on impervious areas would really get people thinking and pushing for BMPs.

Not for profit or faith-based organizations to assist prior to disasters and after disasters. Prior issues to assist in improving of conditions and goals of flood issues management. After disaster issues assist victims in restoration and/or flood mitigation issues rise up home/business. Assist victims with unmet/housing issues that do not qualify for regardless of reasons. Donations through employees or industries or bank draft/EFT AC 4 etc.

Incentive payment for farms with no till practices.

Increase sales tax. Fees from farmers that continue to tile out their fields.

It's a difficult time to find additional sources of revenue. Perhaps the appropriate answer is a reprioritization of some conservation dollars (Fed and State) as well as DOT and rural economic development.

Use existing funds for programs with little value.

Let land owner recognize true land value of marginal lands – and be responsible if they over pay for land.

Watershed tax based on runoff.

If cities drainage districts are faced with mandates the foundation for compliance should be provided.

Important enough to fund form anywhere. Basically need to find the funds and move it.

The people and business in the floodplain need to pay for cost of preventing flooding of their home or business.

Charge min per resident \$5.00 to belong to watershed group, US funding to buy insurance to cover damage to farm fields used as temp [sic]. (?)

Let quarries take sand out of river free of charge.

Make sure that you're sure you want this and then make double sure you don't. Starve your new baby, like you always do.

US Sec of Ag just proclaimed 342 miles for the upper Mississippi.

FEMA HMGP grants may be option if they expand that program. I don't want more state sales taxes, income taxes, and property taxes.

Additional Comments:

- # 23 Scale/scope of proposed pilot project?
- #24 Disclaimers should be required, pre-purchase not as closing
- #39 Municipal water customers i.e. residents and businesses already pay sales tax and water purchased from city at full retail %

We need to change our priorities and practices! Look tong term at ways to keep development out of flood plains, mitigate climate change, be responsible so we conserve soil, purify water and pass the earth on to our children and grandchildren in good shape, rather than exploit it for short term profit.

No new levies on agricultural land. No new development in the flood plain. Areas that flooded in Cedar Rapids should become green space. Give them aid only to rebuild outside the floodplain. No assistance for stream bank stabilization it just sends the problem downstream. Lucrative conservative programs are available for farmers to enroll flood prove areas to in CRP native grasses and wetlands. They have options, no more levies!

Move the hog back about 100 feet from nearest small steam.

I would like to know what improvements have been made from the 2001, 2003, and 2007 recommendations.

There needs to be some studies done on how many acres and citizens of lowa this will affect. If some of these recommendations are implemented, thousands of lowa will leave the state and several tax dollars will be lost. Do you realize how many flood plains there are in lowa? The cities of Des Moines, Cedar Rapids, lowa City, and Davenport have areas in floodplains. Your committee only had one person representing levee and drainage issues. More of the state needs to be informed before this is voted on. There is no need to rush into such drastic changes.

We answered these questions the best of our ability, we found some unknowledgeable to us, and these are checked neutral.

Tile drainage increases the temporary storage volume in the soil providing for no till to function at its best. This also provides for deep root growth and maximum plant population which in turn reduces runoff.

I think an effort for support staff at the State level to assist with floodplain management after a disaster is important. Also the idea of a State association of floodplain managers would be a great addition and resource base = look at Missouri State Model.

Adopt and enforce Best Management practices on every farm state wide.

No regulation of floodplain until FEMA mapping is complete. No regulations shall be adopted through administrative rules. Any regulations must be through legislation!

This was a hard survey for me as I am not familiar with many of the specifics of the issues. I do know the levee system is crucial to our survival as a city and the surrounding area. It not only protects homes and family – it protects our livelihood and a way of life that set Iowa apart from all others.

Much of this is long overdue since the worst disaster to hit us was over a year ago. Another flood could come next year. Need to mandate strict guidelines for communities and enforce them.

If these items were a little less vague I may have answered them differently.

Have a pilot program for flood reduction in Palo, Iowa where the whole town was flooded. The research and maps should be done before any regulations or projects are put in place.

I am very concerned about the floodplain requirements in the floodplain management section. My understanding is that floodplain maps for the State of Iowa are being redone but will not be completed for 5-7 years. How can we talk about regulating floodplain when we don't even know for certain where the floodplain is?

I did not comment on all areas since I spent all my time with Group 4: Storm Water. One comment I would have regulated on the .2% flood would be great, in some cases that is a significant impact to properties and the property value.

People in floodplains, or any other high risk areas, should receive new FEMA, State, or other Federal help one time to replace homes. Only one time. After that, hey are responsible for themselves. This will serve the same purpose as many regulations and is much easier and less expensive to implement than many new regulations. I live in an area that was flooded in 2008. Half of the people have moved out, the other have flood insurance. If anyone did try to build a new home here, no lender would ever loan them money if they didn't carry flood insurance.

We've been working on these ideas in Palo, with the UI Flood Center. I see Witold [?] used our information in a presentation to group 3. We would REALLY like to see our Dry Creek Watershed used a pilot project per item #27. Results would be publicized and propagated to other communities and watersheds in the Cedar River and other watersheds. We'd like to see some progress made yet in 2009, so the effects could be monitored in the spring.

Your committee had way too many single minded [sic] personal on them protecting their jobs! Bottom line is, does the view and steam control up or do we control the water for out benefit.

Should the general public be filling out this survey?

Let's solve these on individual property levels as much as possible rather than one or more big dinosaurs state programs.

We've been working on these ideas in Palo, with the UI Flood Center. I see Witold used our information in a presentation into group 3. We would really like to see our Dry Creek Watershed used a pilot project per item #27. Results would be publicized and propagated to other communities and watersheds in Cedar River and other watersheds. We'd like to see some more progress made yet in 2009, so the effects could be monitors in the spring.

Palo would REALLY like to see our Dry Creek Watershed used a pilot project per item #27. Results would be publicized and propagated to other communities and watersheds in the Cedar River and other watersheds. We'd like to see some progress made yet in 2009, so the effects could be monitored in the spring.

ALSO SEE COMMENTS FROM DES MOINES WATER WORKS (FOLLOWING) AND CITY OF DUBUQUE (ATTACHED SEPARATELY)

Water Resources Coordinating Council Policy and Funding Recommendations Public Hearing – October 6, 2009

House File 756 passed in the 2009 legislative session required the Water Resource Coordinating Council (WRCC) to submit policy and funding recommendations that promote a "watershed management approach to reduce the adverse effect of future flooding on this state's residents, businesses, communities, and soil and water quality." The WRCC, on June 13, 2009 identified four work groups to work on components of the recommendations required by HF756. This document provides formal comments by the Des Moines Water Works (DMWW) on the work groups recommendations.

DMWW found three central themes identified by each work group; watershed based management, planning, and education. These themes are strongly supported by DMWW, and essential actions needed for improving and protecting lowa's water resources. Watershed management evaluates all aspects of a watershed system, by identifying, prioritizing, and implementing the appropriate mitigation. It brings urban and rural residents of a watershed together with a single purpose of protecting their families, homes, businesses, and the resources that drive their economic viability.

Watersheds are systems. Systems that consists of five components, hydrology, connectivity, biology, land forms, and water quality – one component alone cannot describe a watershed system; and, one practice alone cannot fix the system. There is a tendency to view the many components of a watershed as individual rather than interconnected parts of a complex system. This perspective is leading us to unrestrained use of surface and groundwater sources, even though these are two of the smallest components of water on earth.

DMWW supports additional funding for watershed planning. Developing comprehensive watershed plans, with multiple partners and supported at the local level should be the focus of this funding. Local watershed planning has been shown to be the most effective in improving and protecting lowa's water resources, but funding for planning is many times non-existent.

DMWW also supports planning at the state level. The WRCC was conceived to address and coordinate all water resource programs, funding, and issues, thus allowing lowans to get the best return on the investment of their tax dollars. It is imperative that we all recognize the important role the WRCC has in planning and managing lowa's water and land resources for the future. We support the recommendation for the WRCC to move more quickly from information sharing to actual interagency coordination.

DMWW supports a coordinated multi-faceted approach to educate Iowans on the benefits and challenges of Iowa's water resources. The Water Quality Task Force recommended the state fund a marketing (education) campaign to increase Iowan's awareness of the immense value of our land and water resources. Flood risk should be a part of the total campaign. A sustainable campaign that encourages a public/private partnership and is somewhat patterned after a program like Character Counts, a program that upon seeing six pillars of various colors, the majority of Iowa children instantaneously recognize.

WORKGROUP 1 – FLOODPLAIN MANGEMENT

Floodplain Regulations

No comments

Flood Control Structures (Levees)

In some cases, as with DMWW, our position on the river necessitates a levee to protect the utility's critical infrastructure, but we also recognize there is a limit to the utilization of levees. The overuse of levees will cause further build-up and distribution of increased flows to our downstream neighbors. We agree that the state should consider a program of funding regular inspection and maintenance of approved levee systems to minimize breaching during a flood event, and that the use of any new levees be minimal and used only as a last resort.

Planning

(Comments included in introductory paragraphs)

Flood Risk Education

(Comments included in introductory paragraphs)

WORKGROUP 2 – LOWLAND FOCUS

Planning and Coordination

DMWW strongly supports the formal structure of the WRCC as the entity to develop a state water plan; a plan that addresses and coordinates all water resource programs, funding, and issues. It is imperative that state leaders recognize the important role the WRCC has in planning and managing lowa's water and land resources for the future. We support the recommendation for the WRCC to move more quickly from information sharing to actual interagency coordination.

Non-Structural

DMWW supports the re-design of lowa's landscape to better reflect the benefits of the past when precipitation remained on the land to percolate through the soil, meander in rivers and streams and linger in natural wetlands. The average flow of the Des Moines River in Des Moines has more than doubled since gauging began in 1915 (USGS-Attachment 1). Since areas upstream of Des Moines are almost entirely rural, the increased discharge attributable to urban development and impervious surfaces is minimal. Rather, it must be due to landscape and hydrological modifications in the watershed coupled with increased levels of precipitation and precipitation events. We also know precipitation levels have not doubled since 1915, a logical conclusion is that landscape and hydrological changes are important factors in managing lowa's water and land resources.

Projects

As stated above DMWW supports projects that will re-design lowa's landscape to allow precipitation to remain on the land where it falls. However, the hypothesis that improved drainage may reduce surface runoff, at least in some circumstances may be valid, but it is difficult to imagine that improved drainage will not increase sub-surface flows. The proposed wetland projects replace a drainage system that is not functioning to capacity and also increases the size of the drainage tile. This seems to translate to a more efficient system, better able to transport additional quantities of water and pollutants. Since the size of project wetlands will be determined by economic and sociological factors (as opposed to optimum water storage considerations) our conclusion is that enhanced sub-surface drainage will likely increase stream flows.

The reasoning that drier soils will be better able to absorb a precipitation event and reduce peak flows has some merit in some circumstances, but most increased flows that lead to wide spread flooding are the result of multiple rainfall events on consecutive days. Multiple rainfall events on consecutive days will fall on saturated soils which have lost their capacity to absorb and hold water, regardless of the efficacy of the tiling system. It seems that in this type of circumstance, enhanced drainage will do little to reduce peak flows and has the potential to increase them. The installation of these structures should be very limited, until the effect on flow and transport of contaminates are determined. It is critical that the "leaky system" in place today not be amplified.

Educate and Inform

(Comments included in introductory paragraphs)

WORK GROUP 3 – UPLAND FOCUS

Prior Studies

DMWW has participated in prior water resource task forces and supports the recommendations brought forth by the groups. (See EXHIBIT 2, Page 15, incorporated by reference into the recommendations of the WRCC)

Pilot/Demonstration Project

Again as stated above DMWW supports projects that will re-design lowa's landscape to allow precipitation to remain on the land where it falls. DMWW supports the lowa Flood Center as an entity to research and work with city, state, federal agencies and private organizations to identify policies, strategies, and practices that will minimize flooding and flood damage in lowa.

The "distributed storage" concept proposed by the Iowa Flood Center (University of Iowa) and the multipurpose wetlands proposed by Work Group 2 are two potential practices that may alleviate some flooding; but they must be incorporated into a comprehensive watershed plan that targets and prioritizes implementation strategies and practices. The Iowa Flood Center has the expertise in hydrology to determine the effects of both practices and to ensure size, design and location is appropriate for the watershed.

Education

(Comments included in introductory paragraphs)

DMWW <u>strongly supports</u> conducting hydrological tiling study to determine the impact of tile drainage on flows and groundwater recharge. We also support establishing a soil moisture monitoring network as it is critical to determine the effects of tile drainage in dry and saturated soils.

We agree with the work group that the reassessment of criteria for conservation practices is needed due to changes in weather patterns, cropping rotations, consolidation of livestock production (manure application) and other land use changes. (NRCS Field Office Technical Guide and Engineering Field Manual)

Resources

Watershed Planning - (Comments included in introductory paragraphs)

DMWW supports multi-year funding of the Iowa Flood Center as well as adding them as a participant of the WRCC.

DMWW supports all suggested sources of revenue included in the recommendations:

Referendum amending Iowa's constitution establishing a conservation fund, by which 3/8¢ of

the next 1¢ sales tax increase will go for protecting natural resources

Sales tax collected on drinking water

Sales tax and/or recycle fee on bottled water

Work Group 4 - Stormwater

<u>Utilize a Phase-in approach to Implement Statewide Stormwater Standards Consistent with the Iowa Stormwater</u> <u>Management Manual</u>

DMWW supports the recommendations of Work Group 4 and strongly supports consideration of the hydrological tiling study as stated above.

Education

(Comments included in introductory paragraphs)

DMWW would like to thank the WRCC, the sub-committee and work groups for sharing their time and expertise in developing these recommendations. We would also like to thank the work groups for including drinking water utilities as stakeholders in their groups, because above all the public health of lowans depends on accessible safe drinking water. I would like to publically thank our staff for participating in this important process. And finally, thank you for the opportunity to comment.

Linda Kinman

Research/Regulatory Coordinator

On behalf of DMWW staff:

Ted Corrigan, Director, Water Distribution (Work Group 1)
Dennis McAllister, Project Manager (Work Group 2)
Jennifer Puffer, Project Manager (Work Group 3)
Chris Jones, Ph.D., Laboratory Supervisor (Work Group 4)

ATTACHMENTS

Attachment 1

